

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In re: Methyl Tertiary Butyl Ether (“MTBE”)  
Products Liability Litigation**

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**MDL No. 1358  
C.A. No. 1:00-1898 (SAS)  
M21-88**

**This Document Relates To:**

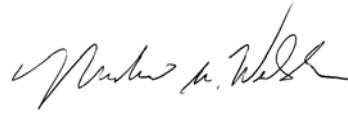
*Commonwealth of Puerto Rico, et al. v.  
Shell Oil Company, et al.,*  
**Case No. 07-CV-10470-SAS  
and  
Case No. 14-CV-1014-SAS**

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**DEFENDANT TAUBER OIL  
COMPANY’S  
NOTICE OF MOTION TO DISMISS  
FOR LACK OF PERSONAL  
JURISDICTION**

PLEASE TAKE NOTICE, that upon the accompanying Declaration of Kevin Wilson sworn to on February 26, 2014; the Declaration of Michael A. Walsh, sworn to on February 28, 2014, and the exhibits thereto; Local Rule 56.1 Statement; and the Memorandum of Law in Support of Defendant Tauber Oil Company’s Motion to Dismiss for Lack of Personal Jurisdiction, Defendant Tauber Oil Company hereby moves this Court, before the Honorable Shira A. Scheindlin, at the Daniel Patrick Moynihan United States Courthouse located at 500 Pearl Street, New York, New York, Courtroom 15C, at a date and time to be determined by the Court, for an Order pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure dismissing the Third Amended Complaint filed in case no. 07-cv-10470-SAS and the First Amended Complaint filed in case no. 14-CV-1014-SAS against it, and granting such other and further relief as the Court deems just and proper.

Respectfully submitted,

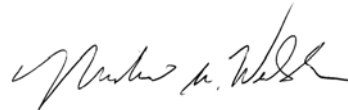


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**ATTORNEYS FOR DEFENDANT  
TAUBER OIL COMPANY**

**CERTIFICATE OF PRE-MOTION LETTER EXCHANGE**

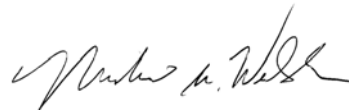
I certify that per this Court's Individual Rules and Procedures, Part IV.B, Tauber Oil Company described the basis for this motion in a letter to Plaintiffs dated February 21, 2014. Plaintiffs responded on February 27, 2014. Counsel for were unable to eliminate the need for filing this Motion to Dismiss.



MICHAEL A. WALSH

**CERTIFICATE OF SERVICE**

I certify that on March 3, 2014, a true and correct copy of this Notice of Motion to Dismiss for Lack of Personal Jurisdiction by Tauber Oil Company was electronically served on counsel of record via LexisNexis File & Serve.



MICHAEL A. WALSH